

From: [Wu, Jennifer](#)
To: [Poulsom, Susan](#)
Subject: FYI for tomorrow- JBLM - Solo Point Monitoring Question and permit
Date: Wednesday, April 18, 2018 10:50:00 AM

Hi Susan, no need to reply to this. We can talk tomorrow - this is FYI.

Permit background: I asked Audrey to pull the NPDES permit and compliance file for JBLM Solo Point and have read through the current permit, fact sheet, and RTC. Mike also told me that the plant is completely different now than the previous permit.

Facility question: I verified that the old permit requires 8 PBDE samples to be collected and analyzed in the first and last years of the permit. PBDE monitoring was added because of potential impacts to marine mammals and was part of NOAA's BiOp. I haven't read the BiOp yet. The permit stipulates 1st and last year of monitoring, and the permit was (I believe) administratively extended in 2017.

I think so long as they took samples in 2012 (1st year of permit), took samples in 2017 (last year of permit), and took samples in 2016 (1st year of new plant operating), that is all they need to do for PBDE monitoring under the current permit. Since the intent is to establish a baseline of PBDE concentrations and assess the levels, that's what I should do when writing the new permit and doing consultation to see if additional monitoring or limits are needed.

Talk to you tomorrow! - Jenny

-----Original Message-----

From: Poulsom, Susan
Sent: Tuesday, April 17, 2018 12:08 PM
To: Wu, Jennifer <Wu.Jennifer@epa.gov>
Cc: Rodriguez, Jason <Rodriguez.Jason@epa.gov>; Keenan, Dru <keenan.dru@epa.gov>
Subject: FW: JBLM - Solo Point Monitoring Question - Overdue DMRs by 14 days for Permit WA0021954

Hi Jenny - Can you take a look at Cindy Trout's question on the existing permit for Solo Point? We can talk about it on Thursday. Thanks!

<https://www.epa.gov/npdes-permits/washington-npdes-permits>

-----Original Message-----

From: Keenan, Dru
Sent: Tuesday, April 17, 2018 7:59 AM
To: Rodriguez, Jason <Rodriguez.Jason@epa.gov>
Cc: Poulsom, Susan <Poulsom.Susan@epa.gov>
Subject: RE: JBLM - Solo Point Monitoring Question - Overdue DMRs by 14 days for Permit WA0021954

Hi Jason, Susan will have to answer this one. Susan, this is the Joint Base Lewis McCord (JBLM) Solo Point facility.

Dru
Druscilla M. Keenan
U.S. EPA Region 10
1200 6th Ave Suite 900 M/S 155
Seattle, WA 98101
keenan.dru@epa.gov
206-553-1219

-----Original Message-----

From: Rodriguez, Jason

Sent: Tuesday, April 17, 2018 7:25 AM

To: Trout, Cynthia K CIV USARMY IMCOM CENTRAL (US) <cynthia.k.trout.civ@mail.mil>; Poulson, Susan <Poulson.Susan@epa.gov>; Keenan, Dru <keenan.dru@epa.gov>

Subject: RE: [Non-DoD Source] NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 14 days for Permit WA0021954

I will direct this question to the Office of Water as to the intent of the permit. If monitoring is not required for any particular monitoring period please enter the DMR with a NODI code of '9 not required'.

-Jason

Jason Rodriguez | Office of Compliance and Enforcement | Water and Wetlands Unit U.S. Environmental Protection Agency | Region 10

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-----Original Message-----

From: Trout, Cynthia K CIV USARMY IMCOM CENTRAL (US) [<mailto:cynthia.k.trout.civ@mail.mil>]

Sent: Monday, April 16, 2018 2:42 PM

To: Rodriguez, Jason <Rodriguez.Jason@epa.gov>; R10NetDMR <R10NetDMR@epa.gov>; Kenknight, Jeff <Kenknight.Jeff@epa.gov>; Mirza, Sabah <Mirza.Sabah@epa.gov>; prodnetdmria@gmail.com; eng.sharon@epa.gov

Cc: paul.t.steucke.civ@mail.mil; Nino, Raul J Sr CTR (US) <raul.j.nino.ctr@mail.mil>; Trout, Cynthia K CIV USARMY IMCOM CENTRAL (US) <cynthia.k.trout.civ@mail.mil>

Subject: RE: [Non-DoD Source] NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 14 days for Permit WA0021954

Thanks for the clarification. Are we required to monitor annually?

Our permit special condition is for Quarterly sampling in the first and last year of the permit. We actually tested in 2016 with half the year under the old plant and half a year under the new plant. I also tested in 2017 as I just reset the clock on the permit for baselining the new plant effluent. Note many Washington labs no longer hold this certification for PBDE testing.

Please advise on how to correctly report in the DMR. We collected samples quarterly, influent and effluent for a total of 8 samples in the year. Each samples was tested for 14 cogeners. No lab in the state is currently certified to do these analyses.

How does the administratively extended permit impact our special conditions for monitoring? Do I just reset the clock and start the permit condition over? Please advise.

Cindy

Cynthia K. Trout, P.E.
Water Program Manager
Environmental Division

Public Works, JBLM, WA
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253.966.1768
><(((o> Water is Life <o((((><

-----Original Message-----

From: Rodriguez, Jason [<mailto:Rodriguez.Jason@epa.gov>]
Sent: Monday, April 16, 2018 2:18 PM
To: Trout, Cynthia K CIV USARMY IMCOM CENTRAL (US) <cynthia.k.trout.civ@mail.mil>; R10NetDMR <R10NetDMR@epa.gov>; Kenknight, Jeff <Kenknight.Jeff@epa.gov>; Mirza, Sabah <Mirza.Sabah@epa.gov>; prodnetdmria@gmail.com; eng.sharon@epa.gov
Cc: Steucke, Paul T Jr CIV USARMY IMCOM CENTRAL (US) <paul.t.steucke.civ@mail.mil>
Subject: RE: [Non-DoD Source] NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 14 days for Permit WA0021954

001-Y is your annual POLYBROMINATED BIPHENYLS DMR. It is due each year by March 31st.
-Jason

Jason Rodriguez | Office of Compliance and Enforcement | Water and Wetlands Unit U.S. Environmental Protection Agency | Region 10
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-----Original Message-----

From: Trout, Cynthia K CIV USARMY IMCOM CENTRAL (US) [<mailto:cynthia.k.trout.civ@mail.mil>]
Sent: Monday, April 16, 2018 2:10 PM
To: R10NetDMR <R10NetDMR@epa.gov>; Kenknight, Jeff <Kenknight.Jeff@epa.gov>; Mirza, Sabah <Mirza.Sabah@epa.gov>; Rodriguez, Jason <Rodriguez.Jason@epa.gov>; prodnetdmria@gmail.com; eng.sharon@epa.gov
Cc: paul.t.steucke.civ@mail.mil; Trout, Cynthia K CIV USARMY IMCOM CENTRAL (US) <cynthia.k.trout.civ@mail.mil>
Subject: RE: [Non-DoD Source] NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 14 days for Permit WA0021954

I am not sure what this DMR report is for? What is Discharge Point 001-Y?

We report Discharges under 001-A and I have attached the report for reporting period 12/31/2017

Please Advise.

Cynthia K. Trout, P.E.
Water Program Manager
Environmental Division

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><(((o> Water is Life <o((((><

-----Original Message-----

From: netdmr-notification@epa.gov [<mailto:netdmr-notification@epa.gov>]
Sent: Saturday, April 14, 2018 8:00 PM
To: kenknight.jeff@epa.gov; mirza.sabah@epa.gov; rodriguez.jason@epa.gov; prodnetdmria@gmail.com; Trout, Cynthia K CIV USARMY IMCOM CENTRAL (US) <cynthia.k.trout.civ@mail.mil>; eng.sharon@epa.gov
Subject: [Non-DoD Source] NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 14 days for Permit WA0021954

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Dear Permittee or Authorized Representative:

We are contacting you to assist you in complying with your NPDES permit reporting requirements. This is a notification that we have not received a required discharge monitoring report, but is NOT an official notice of violation.

As of 04/14/2018, the following Discharge Monitoring Reports (DMRs) are overdue to EPA Region 10 - Washington by 14 days:

Facility Name	NPDES ID	Permitted Feature - Designator	Monitoring Period End Date	DMR Due Date
JOINT BASE LEWIS-MCCHORD - JBLM SOLO POINT WWTP	WA0021954	001 - Y	12/31/2017	03/31/2018

Failure to submit your DMR(s) in a timely fashion constitutes non-compliance with the requirements of your NPDES permit WA0021954. Please be sure to submit all overdue DMRs immediately via NetDMR.

If you have already submitted your DMR, please contact us immediately at the email address below so we can help resolve this problem. If you have questions, require technical assistance or think this information is in error, please email R10NetDMR@epa.gov with your NPDES ID, your contact information, and specific information regarding the problem so we can investigate the issue. After you submit your overdue DMR(s) the system will automatically recognize that you have done this.

As a reminder, compliance information about your permit is available to the public on EPA's Enforcement Compliance History Online (ECHO) website at Caution-<https://echo.epa.gov>.

Sincerely,

NetDMR Team